
United States of America	:	United States District Court
<i>Plaintiff,</i>	:	Eastern District of Pennsylvania
	:	
v.	:	
	:	Criminal No. 2:18-CR-00315-GEKP-1
Michael Harris	:	
<i>Defendant.</i>	:	

ORDER

AND NOW, to wit, this _____ day of _____, 20____, upon consideration of the within Petition, it is hereby ORDERED and DECREED that the Motion for Continuance is Granted.

BY THE COURT,

J.

Nino V. Tinari & Associates
By: Nino V. Tinari, Esquire
Identification No. 04296
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Attorney for Michael Harris

United States of America	:	United States District Court
<i>Plaintiff,</i>	:	Eastern District of Pennsylvania
	:	
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	:	Criminal No. 2:18-CR-00315-GEKP-1
Michael Harris	:	
<i>Defendant.</i>	:	

DEFENDANT’S MOTION TO REQUEST A CONTINUANCE FOR TRIAL

TO THE HONORABLE GENE E.K. PRATTER, JUDGE OF SAID COURT:

COMES NOW, the Defendant, Michael Harris, by and through his attorney, Nino V. Tinari, Esquire, does hereby respectfully request this Honorable Court to grant the forthcoming Motion for Continuance in this matter. Therefore, states as follows:

1. Defense Counsel entered his appearance on September 25, 2020.
2. Trial has been set by the Court in this matter on January 18, 2022.
3. Defense Counsel is reviewing additional voluminous discovery and is in negotiations with the government attorney in an attempt to achieve a non-trial disposition.
4. The government has expressed its non-opposition to this request.

5. The ends of justice will be served by granting a trial continuance, and that a continuance for the above stated reasons outweigh the interest of the public and the Defendant in a speedy trial. Furthermore, a plea agreement between the United States and the Defendant, or a properly prepared defense, is in the best interests of justice.
6. The time until the next scheduled trial date is excludable time under the Speedy Trial Act, and all reasons for the continuance appear on the face of the motion such that a supporting brief is necessary.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests that the within Motion for Continuance be granted.

Respectfully submitted,

Date: July 28, 2022

/s/ Nino V. Tinari
Nino V. Tinari, Esquire
Attorney for Petitioner
200 S. Broad Street, Suite 400
Philadelphia, PA 19102
(215) 790-4010

VERIFICATION

NINO V. TINARI, ESQUIRE, hereby states that he is the attorney in the foregoing matter and that the statements made in the foregoing matter are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements made therein are subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsifications to authorities.

Date: July 28, 2022

/s/ Nino V. Tinari
Nino V. Tinari, Esquire
Attorney for Petitioner
200 S. Broad Street, Suite 400
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Michael Harris	:	
<i>Defendant.</i>	:	

CERTIFICATE OF SERVICE

I, Nino V. Tinari, Esquire, certify that a true and correct copy of the within Petition was served upon the following via electronic submission:

Kelly M. Harrell
Assistant United States Attorney
United States Attorney's Office, Eastern District of Pennsylvania
615 Chestnut Street, Suite 1250
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Everett R. Witherell
Assistant United States Attorney
United States Attorney's Office, Eastern District of Pennsylvania
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Joseph T. Labrum, III
Assistant United States Attorney
United States Attorney's Office, Eastern District of Pennsylvania
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Philadelphia, Pennsylvania 19106

Honorable Gene E.K. Pratter
United States District Judge for the Eastern District of Pennsylvania
10613 U.S. Courthouse
601 Market Street, Courtroom 10-B
Philadelphia, PA 19106

Date: July 28, 2022

Respectfully Submitted,

/s/ Nino V. Tinari

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